

Privacy Policy

Date of issuance: January 5, 2018

The website www.zgcom.net (hereinafter: the "Website") is owned and operated by NEDT Foundation Limited (hereinafter "NEDT"). The Website is available directly on the Internet at <http://www.zgcom.net> and may also be available through other addresses or channels.

As a user of this Website and/or Participant to the NEDT Sale (hereinafter: "User" or "you"), please refer to the Terms of Use and to the NEDT Sale Terms in addition to this privacy policy (hereinafter: the "Privacy Policy").

1. PURPOSE

NEDT provides this Privacy Policy to describe our procedures regarding the collection, use and disclosure of personal data collected by NEDT while using the Website or received from Users during the NEDT Sale. Personal data has the meaning given by the Singapore Personal Data Protection Act (hereinafter: "Personal Data"). The data controller (i.e. the legal entity responsible for the purpose and content of the data file) is NEDT.

This Privacy Policy forms a part of the Terms of Use relating to the Website. Capitalized terms which are not defined in this Privacy Policy shall have the meanings set forth in the aforesaid Terms of Use.

2. CONSENT

By using this Website and/or participating to the NEDT Sale, you consent to the terms of our Privacy Policy and to NEDT processing your Personal Data for the purposes exposed in this Privacy Policy. If you do not agree to this Privacy Policy, please refrain from using the Website and/or participating to the NEDT Sale.

Your consent to this Privacy Policy followed by your submission of Personal Data represent your explicit agreement to the collection, processing, storage and, when applicable, deletion of Personal Data by NEDT as described in this Privacy Policy.

3. CHANGES TO THE POLICY

NEDT reserves the right, at its discretion, to change, modify, add, or remove portions from this Privacy Policy at any time. You will be notified of such changes. Your continued use of our Website following the posting of changes to these terms means you accept these changes. It is your responsibility to check regularly this Privacy Policy to be informed of any changes. If you do not agree to the Privacy Policy (including any amendments), then you should immediately cease using the Website.

4. PERSONAL DATA COLLECTED AND PROCESSED

This Privacy Policy applies to all information which is received during your visit to or use of the Website and/or creation of an account and/or participation to the NEDT Sale.

When you visit the Website, details of your access may be automatically registered, including the date and time of your visit, which browser you are using, login dates, the date and time you access to the Website, length of time you spend on the Website, your browsing history (recorded by the text and graphics files that compose that page), your operating system version, your IP address, the place of connection, the volume of data transferred, the links that you may follow, the webpages and content of the Website that you view, the duration of such viewing as well as any other similar information and statistics that relate to your interactions with the Website. This information and data is collected automatically by NEDT in particular through cookies (including performance and tracking cookies, functional cookies, technical cookies, browser cookies, tokens, web beacons and other tracking technologies (see **Clause 6**)). Such details may also be collected through third party application and content tools such as Google Analytics (see **Clause 7**).

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NEDT may also collect Personal Data that you provide as part of registration to the Token Sale and the administration and personalization of your account, such as your name, surname, your Ethereum address or other cryptocurrency account details, details of your wallet, email address, phone number and other contact information.

NEDT may also collect the following Personal Data:

- Transactional information, including information about the number of you purchase;
- User preferences, such as newsletter, community choices and other information you select in the your account when registering on the Website or indicated by your use of the Website.

NEDT may use your email address and/or your account to send updates, newsletters or news regarding NEDT and/or the Token Sale and/or other offers that may be of interest to you.

NEDT may supplement information you provide with information received from third parties.

When you use the Website, you may submit information and content to your profile and otherwise transmit information to NEDT or to other Users, NEDT stores this information and registration information so that we can provide you with personalized features.

In addition to the information contained in this Privacy Policy, the Website may provide Users with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

Before ordering any product on or through the Website, the different steps of the electronic purchase will be communicated to you. You will receive an automatic confirmation of the products purchased through the Website and by email. Typographic mistakes will be automatically corrected by the Website.

5. USING YOUR PERSONAL DATA

The main reason why we collect Personal Data about you is to provide you the Website and improve the Website features, to enable you to enjoy and easily navigate the Website, to keep a details list of the Participants to the Token Sale, to keep you updated about the advances of the NEDT Project, to administer your account and, eventually, to propose you some products that may be of interest to you.

You understand and agree that your Transactional information will be made public on the Ethereum blockchain and, therefore, disclosed to anyone.

NEDT will use your Personal Data to provide you with a better service, and in particular to: keep internal records; communicate with you; provide you with information about new products available, blog posts, promotions, special offers and other information; personalize the promotional offers you see, in particular based upon your activity and your transaction history; respond to your questions and comments; send you NEDT's newsletter, unless you unsubscribe ; prevent potentially prohibited or illegal activities ; conduct research and compile statistics on usage patterns; process transactions; manage your account; enforce the Terms; comply with our legal requirements; as otherwise described to you at the point of collection.

If you contact us via email to the contacts set out on the Website, we will keep a record of that correspondence. Within the applicable rules and regulations, NEDT may use the collected information to analyze your preferences and habits, personalize your use of the Website as well as enhance the Website and all of its functions.

Your Personal Data may be accessed, processed and stored as necessary for the uses stated above in accordance with this Privacy Policy. While NEDT may share your Personal Data with agents and contractors in order to perform the functions listed above, including hosting services, we require that they treat your Personal Data, and limit their use, in accordance with the standards specified in this Privacy Policy and according to the same security standards as those used by NEDT. You understand and agree that NEDT may transfer your Personal Data to a third party for hosting or processing purposes.

NEDT is not responsible for circumvention of any privacy settings or security measures contained on the Website. You understand and acknowledge that, even after removal, copies of your Personal Data may remain viewable in cached and archived pages or if other Users have copied or stored your Personal Data.

6. COOKIES, TOKENS, WEB BEACONS AND OTHER TRACKING TECHNOLOGY

Tracking information is automatically collected about all visitors to the Website. This information consists of both individual and aggregated tracking information and is automatically gathered using "cookies." A cookie is a small data file containing information, such as a user's login name, that is written to the user's hard drive by a web server and used to track the pages visited. We use cookies in several ways to track user behavior.

Cookies store visitors' preferences and past activity on the Website and other websites in order to provide better service to our visitors. The information we gather on an individual basis is used for advertising and internal purposes, such as accessing a member's account information. We also use tracking information on an aggregate basis, to track the usage of our Website, to analyze traffic patterns on the Website, and to provide anonymous reporting of usage for internal and external clients. In all cases, cookies used by NEDT are encoded and contain a unique digital signature to prevent tampering. They do not contain user passwords.

Cookies allow NEDT to store information on the server (for example language preferences, technical information, click or path information, etc.) to help make the web experience better for you and to conduct site analysis and website performance review. Most Web browsers are set up to accept cookies, although you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Note, however, that some portions of the Website may not work properly if you refuse cookies.

NEDT may also use a "Web beacon" on the Website (also known as an "action tag", a "tracking pixel" or "clear GIF technology"), or similar technology, which helps analyze the effectiveness of websites by measuring, for example, the number of visitors to a site, how many visitors clicked on key elements of a site or what Web pages were visited. NEDT uses cookies, tokens, web beacon and other tracking technology to facilitate your access to the Website and analyze the traffic and usage of the Website, as well as identify malfunctions. It also allows NEDT to enhance your experience with the Website as well as improve its content and conception, in particular depending on your preferences. They may also be used for marketing purposes.

NEDT may collaborate with other companies that place cookies, tokens, web beacons or other tracking technology on the Website. These companies help NEDT in the management of the Website and offer additional services and products. The use of these technologies by such third parties is subject to their own conditions, privacy rules and terms of use, which are not covered by this Policy and for which NWT does not have any responsibility.

You may at any time choose to deactivate the use of some or all of the cookies by selecting appropriate parameters on your navigator (as the case may be, with the exception of technical cookies necessary for the functioning of the Website). However, deactivation of this kind might prevent the use of certain and/or all functions of this Website.

7. GOOGLE ANALYTICS

The Website may use Google Analytics, an Internet site analysis service supplied by Google Inc. ("Google"). Google Analytics uses cookies. The data generated by the cookies concerning your use of the Website (including your IP address) will be forwarded to, and stored by, Google on servers located in particular in the United States. Google will use this information to evaluate your use of the Website, compile reports on site activity for its publisher and provide other services relating to the activity of the Website and the use of the internet.

The use of Google Analytics on the Website may also integrate Google Analytics Advertising Features, especially for marketing and remarketing purposes. Such features may include the use of first-party cookies (Google Analytics cookies;

<https://www.google.com/policies/technologies/types/>) and third-party cookies (such as the DoubleClick cookie).

Google may release the data received to third parties if there is a legal obligation to do so or when the third parties process these data for the account of Google including, in particular, the publisher of this Website. Google will not cross-reference your IP address with any other data held by Google.

You may deactivate the use of cookies by selecting appropriate parameters on your navigator. . Please check your browser's cookie settings support pages to inform yourself on the instructions to be followed. Google has itself developed and Opt-out Browser add-on that enables you to opt-out of Google's Analytics program in relation to various browsers (including Microsoft Internet Explorer, Google Chrome, Mozilla Firefox, Apple Safari and Opera). It is available on <https://tools.google.com/dlpage/gaoptout/>.

Please note however that deactivation of this kind might prevent the use of certain functions of this Website. By using the Website you specifically consent to the processing of your personal data by Google under the conditions and for the purposes described above.

8. DATA SHARING AND TRANSFER

NEDT may share the collected information with outside companies or agents only in relation to technological maintenance, hosting, payment processing (if applicable) or working on behalf of NEDT for the Website.

Such transfer is made to help or participate in the Website's operation, in particular by managing, hosting or maintaining the Website, or to conduct research, monitor and analyze the network's status. NEDT shall conclude any required agreement with such outside companies or agents to ensure that data recipients guarantee adequate data protection at all times. The collected data may be passed on without restriction to any subsidiary or affiliates of NEDT, which shall guarantee and be subject to the same data protection requirements as NEDT. Your Personal Data collected through the contact form shall only be transferred, as the case may be, for the purpose of answering your query.

The information obtained through the Website is mainly stored in the Singapore, but may also be sent to other countries when appropriate. You expressly consent to such a transmission, being specified that NEDT shall respect all applicable rules and regulations and shall adopt all required and necessary measures prior to the transmission of data abroad.

NEDT may transfer the collected Personal Data to any government and law enforcement officials or private parties as it, in its sole discretion, believes necessary or appropriate to respond to claims and legal actions (including but not limited to subpoenas), to protect the property and rights of NEDT or a third party, to protect the safety of the public or any person, or to prevent or stop any activity that may be considered to be, or to pose a risk of being, illegal, unethical or legally actionable.

9. TRANSFER TO PROVIDERS

NEDT may transfer your Personal Data to providers for the purpose of delivering the services. Providers will process your Personal Data and will be solely responsible for them after the transfer by NEDT. You hereby expressly agree that NEDT may transfer your Personal Data to providers located abroad, with a similar level of protection than Singapore and that the providers will process your Personal Data under their sole responsibility and subject to the laws applicable in their country.

10. BIG DATA

NEDT may use only non-identifiable aggregated data collected through the Service to analyze Website usage and system performance ("**Big Data**"). Provided Big Data does not contain Personal Data (even by recoupment of information or of Personal Data) you understand and agree that Big Data may be used by NEDT and shared with third parties in any manner. NEDT may share Big Data and/or aggregated information that does not include Personal Data or log data with third parties for analysis and other purposes.

11. SECURITY

NEDT uses standard technology and security precautions, rules and other procedures to protect your personal information from unauthorized access, improper use, disclosure, loss or destruction. It is your personal responsibility to ensure that the computer you are using is adequately secured and protected against malicious software, such as Trojans, computer viruses and worm programs.

NEDT has implemented suitable security policies, rules and technical measures to protect and safeguard the Personal Data under our control from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction or accidental loss. All our employees and data processors that have access to, and are associated with the processing of your Personal Information, are obliged to respect the confidentiality of your information.

YOU ACKNOWLEDGE THAT THE USE OF THE INTERNET IS NOT SAFE AND THAT THERE ARE CERTAIN INHERENT RISKS TO YOUR PERSONAL DATA. COMMERCELAB SHALL MAKE REASONABLE EFFORTS TO PROTECT YOUR PERSONAL DATA BUT IT CANNOT GUARANTEE OR WARRANT THAT DATA YOU PROVIDE TO COMMERCELAB IS SAFE AND PROTECTED FROM UNAUTHORIZED THIRDPARTY ACCESS AND THEFT AND, THEREFORE, WAIVES ALL LIABILITY IN THIS RESPECT.

12. ACCESS TO THE DATA

As a User, you can ask NEDT whether it has stored any personal data on you, file a request for further information, receive a copy of the data stored in our systems (to that end, NEDT shall require a copy of an official form of identification) as well as subsequently instruct NEDT to correct any erroneous personal data. Any request for access must be sent by registered letter with a copy of your ID to: NEDT Foundation Limited, 190 Clemenceau Avenue, #06-08, Singapore 239924.

13. SUPPRESSION OF THE DATA AND BACK-UP SYSTEMS

Any Personal Data that has been collected through the Website may be kept and remain for a certain duration, in particular (without limitation) in case of back-up systems and/or in order to answer to a User's query made through the contact form, but shall be suppressed as soon as its use is not required anymore. Anonymous information (including in particular data collected through the use of cookies) may be kept without any limitation.

14. BUSINESS TRANSFERS

NEDT may sell, transfer or otherwise share some or all of its assets, including your Personal Data and Big Data, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy or insolvency event. Your consent to this Privacy Policy followed by your submission of Personal Data represent your explicit agreement to that transfer.

15. LINKS TO OTHER SITES

The Website may contain links to other sites. Other sites may also reference or link to the Website. This Privacy Policy does not apply to websites which are operated by third parties or under their control and are not affiliated with NEDT. NEDT is not responsible for the privacy policies or the content of such other sites. NEDT therefore requests that you consult the respective privacy policies of such third-party websites, which do not lie in NEDT's area of responsibility.

16. JURISDICTION AND GOVERNING LAW

The Privacy Policy, as well as all matters arising out or in relation to it (including non-contractual disputes or claims and their interpretation) shall be governed by the laws of Singapore, to the exclusion of the rules on conflicts of laws. Any claim or dispute regarding the Policy or in relation to it shall (including for non-contractual disputes or claims and their interpretation) be subject to the exclusive jurisdiction of the Courts of Singapore, subject to an appeal at the Singapore Courts.

You agree that any dispute is personal to you and NEDT, and that any dispute shall only be resolved by an individual litigation and shall not be brought as a class action, or any other

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representative proceeding. You agree that a dispute cannot be brought as a class or representative action or on behalf of any other person or persons. You shall maintain the confidentiality of any proceedings, including but not limited to, any and all information gathered, prepared, and presented for purposes of the litigation or related to the dispute(s) therein.